

EXHIBIT 9

From: [Yetta G. Kurland](#)
To: [Minicucci, Lora \(LAW\)](#); [David B. Rankin](#); [Tala Alfoqaha](#)
Cc: [Hurd, Steven D.](#); [Philon, Rachel S.](#); [Tucker, Jacob P.](#)
Subject: RE: Local 2507 - ESI Proposal Response
Date: Monday, April 14, 2025 3:58:55 PM

This email sent by kurland@kurlandgroup.com originated from outside the Firm.

Hi Lora,

We are prepared to discuss your proposed ESI search terms at our meeting this afternoon.

Below is feedback that can be helpful in doing so:

The biggest impediment to getting an agreed to ESI search is the insistence that you limit information for the period from 2016.

So, for example, we don't in theory have an issue with the custodians you propose in terms of the titles with a couple of exceptions, but there are individuals missing because you have cut out the relevant time periods. For example, you provide the Fire Commissioner for RFP#s 38-41 that relate to implementation of Local Law 18 of 2001, but you do not include Tom Von Esson who was the Commissioner in 2001 when the law was implemented.

That being said in an effort to compromise we will agree to limit the scope of the search for the following topics:

RFP# 24 from 2001

RFP# 38 from 2000

RFP 39-41 from 2001

This means that the respective positions for this time periods need to be included as custodians

Next, why do you only include the director or deputy commissioner of OMB and not the commissioner? It seems especially with some topics like RFP# 24 and 38-41 that the OMB commissioner is necessary.

Finally, there are some changes to some of the search terms we would propose. In specific,

RFP# 24 – we do not need the search terms that include EMS. The only search terms necessary are “pattern bargain*” “civilian bargain*” “uniform bargain*” “civilian AND (bargain* OR pattern)” “uniform* AND (bargaining OR pattern” and “set* w/in 15 words

of “pattern”

RFP# 7 of June 2023 – the additional search terms should be modified to include the unions representing both Fire and EMS “OR” the specific titles of both Fire and EMS

RFP# 8 of June 2023 – Need to add the Mayor’s Office and the search term “legislat*”

First, the custodians have to go back to the time period in question. Often times you are missing custodians because you have improperly shortened the temporal scope.

Yetta G. Kurland, Esq.
Senior Partner
The Kurland Group
Tel: 212 253-6911 || Fax: 212 614-2532
85 Broad Street, 18th Floor | NY, NY 10004
www.kurlandgroup.com



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From: Minicucci, Lora (LAW) <lminicuc@law.nyc.gov>
Sent: Tuesday, April 1, 2025 4:29 PM
To: 'Yetta G. Kurland' <kurland@kurlandgroup.com>; David B. Rankin <DRankin@blhny.com>; Tala Alfoqaha <talfoqaha@blhny.com>
Cc: shurd <shurd@proskauer.com>; rphilion <rphilion@proskauer.com>; Tucker, Jacob P. <jtucker@proskauer.com>
Subject: Local 2507 - ESI Proposal Response

Good afternoon,

Please see attached correspondence.

Best,

Lora

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Lora Minicucci
Deputy Chief, Labor and Employment
New York City Law Department
100 Church Street, Room 2-117
New York, New York 10007
(212) 356-2078
Cell: 646-285-3994
lminicuc@law.nyc.gov
Pronouns: she/her/hers